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*\*Pro Hac Vice Application Pending*

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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

JOHN DOE, A MINOR CHILD, BY AND  
THROUGH HIS NEXT FRIEND JANE  
DOE,

Plaintiff,

vs.

TWITTER, INC.,

Defendant.

**Case No.: 3:21-cv-00485**

**EX PARTE MOTION FOR APPOINTMENT  
OF GUARDIAN AD LITEM;  
DECLARATION OF JANE DOE IN  
SUPPORT OF MOTION; [PROPOSED]  
ORDER APPOINTING GUARDIAN AD  
LITEM**

Applicant Jane Doe (true initials B.M.) is the mother of Plaintiff John Doe. John Doe is a 17-year-old minor who has eleven causes of action in the above-captioned matter. Jane Doe is qualified and competent to act in John Doe's best interests, as she has for John Doe's entire life. She is qualified to understand and protect the rights of the person she will represent and has no interest adverse to the interests of her minor child. Her Declaration is attached to this Motion.

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**EX PARTE MOTION FOR APPOINTMENT OF GUARDIAN AD LITEM; DECLARATION  
OF JANE DOE IN SUPPORT OF MOTION; [PROPOSED] ORDER APPOINTING  
GUARDIAN AD LITEM**

Therefore, Plaintiff hereby moves this Court for an order appointing Jane Doe (true initials B.M.) as guardian ad litem of John Doe for the purpose of bringing this lawsuit against Defendant on the claims stated above.

Respectfully submitted,

Dated: January 20, 2021

By: /s/ Paul A. Matiasic

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DECLARATION OF JANE DOE

I, JANE DOE, do declare as follows:

1. I am over the age of 18 and swear, under penalty of perjury, that the following is true of my own personal knowledge.

2. John Doe is a minor of the age of 17 years.

3. John Doe is commencing this lawsuit against Defendant Twitter, Inc. for various violations stemming from child sex trafficking, including but not limited to, violation of The Trafficking Victims Protection Act, 18 U.S.C. § 1591(a), violation of the Duty to Report Child Sexual Abuse Material, 18 U.S.C. § 2258A, Receipt and Distribution of Child Pornography, 18 U.S.C. § 2252A, and for damages and fees recoverable under each.

4. I am the mother of John Doe and no previous petition for guardian ad litem has been filed in this matter.

5. I am a competent and responsible person and fully capable and qualified to act as John Doe's guardian ad litem.

6. My home residence is in Florida.

7. I am ready, willing, and able to act as guardian ad litem to John Doe.

8. If the Motion is granted, I consent to act as guardian ad litem for the minor, John Doe, in the above action.

Executed this 20 day of January, 2021 in the State of Florida.

  
JANE DOE

**[PROPOSED] ORDER**

THE COURT FINDS that it is reasonable and necessary to appoint a Guardian ad Litem for the minor child, John Doe, appointed as requested.

THE COURT ORDERS that Jane Doe (true initials B.M.) is hereby appointed as the Guardian ad Litem for minor child, John Doe.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Judge of the United States District Court

**CERTIFICATE OF SERVICE**

I hereby certify that on January 20, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email address denoted on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 20th day of January, 2021.

/s/ Hannah E. Mohr  
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